

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

CR.NO. 12-CR-167-03-SM

QUENTIN SIMON

**GOVERNMENT'S ASSENTED TO MOTION TO CONTINUE SUPERVISED
RELEASE REVOCATION HEARING**

NOW COMES the United States of America, by and through John P. Kacavas, United States Attorney for the District of New Hampshire, and hereby requests that the supervised release revocation hearing currently scheduled for Wednesday, April 8, 2015, be continued for a period of thirty days. In support thereof, the Government states as follows:

1. The parties are attempting to resolve this matter by agreement but have not been able to do so by today's date.
2. If a contested hearing is necessary, the government would call Detective Patrick Nichols of the New York City Police Department to testify as a witness. Unfortunately, Detective Nichols is unavailable on Wednesday, April 8, 2015, and additional time is necessary to make arrangements for Detective Nichols to travel to New Hampshire.
3. This is the first request for a continuance of the hearing by the Government.
4. The Defendant does not object to this motion.
5. No memorandum of law is required to resolve the issues raised herein.

WHEREFORE, the Government respectfully requests that this Honorable Court continue the supervised release revocation hearing for thirty days to allow Detective Nichols to testify.

Respectfully submitted,
JOHN P. KACAVAS
United States Attorney

By: /s/Debra M. Walsh
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Dated: April 3, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served through ECF, this date, April 3, 2015 on Paul Garrity, Esquire, 14 Londonderry Road, Londonderry, NH 03053, counsel for Defendant.

/s/Debra M. Walsh
Debra M. Walsh